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Civil Rights, Labor & Employment, & Civil Litigation

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July 6, 2021

VIA ECF

Hon Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square
Room 2201A
New York, NY 10007

Re: Tabitha Lulo v. OTG Management, Inc.
Civil Action No. 19-CV-03776 (PAE)

Dear Judge Engelmayer:

I represent the plaintiff in this action in which she claims that defendants subjected her to discrimination/ retaliation in violation of the FMLA, and discriminatory termination due to her pregnancy, and pregnancy-based disability in violation of the NYS and NYC Human Rights Laws.

Pursuant to Rule 1(E) of Your Honor's Individual Rules of Practice, and with the consent of defense counsel, I respectfully request that the Court extend the time to plaintiff for an additional week to serve and file her opposition papers to July 16, 2021. The current deadline for plaintiff to oppose is Friday, July 9, 2021.

I ask for this extension based on the following: I have been trying to hire a law intern last week, and I'm continuing those efforts of recruitment this week, also, I have had to bring my Mother (for whom I'm her prime caregiver) to her doctor's appointments (the round-trip from my home to NYC is 4 hours in and of itself), and thus, I need additional time to submit/ file plaintiff's opposition papers.

As set forth above, defense counsel consents to this application, and this is the first request by either party to seek an extension of the original deadlines for the present briefing set forth Your Honor's Order (Doc #39) for defendant's motion for summary judgment. If Your Honor grants this Motion, I ask that defendant's reply should be re-scheduled for an additional week until July 30, 2021.

I appreciate Your Honor's consideration of plaintiff's application.

Respectfully Submitted,

/s/ Jimmy M. Santos
Jimmy M. Santos, Esq.

cc: Michael Schmidt, Esq. (via ECF)

Granted. Plaintiff's opposition is due July 16, 2021.
Defendant's reply is due July 20, 2021.

SO ORDERED.

A handwritten signature in cursive script, reading "Paul A. Engelmayer", written over a horizontal line.

PAUL A. ENGELMAYER
United States District Judge

July 6, 2021